

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

PSARA ENERGY, LTD.

Plaintiff

**SPACE SHIPPING, LTD.; GEDEN HOLDINGS:
LTD.; ADVANTAGE ARROW SHIPPING,
LLC; GENEL DENIZCILIK NAKLIYATI A.S.
A/K/A GEDEN LINES; ADVANTAGE
TANKERS, LLC; ADVANTAGE HOLDINGS,
LLC; FORWARD HOLDINGS, LLC;
MEHMET EMIN KARAMEHMET;
GULSUN NAZLI KARAMEHMET -
WILLIAMS; and TUĞRUL TOKGÖZ**

Defendants

No. 1:18-cv-00178

ADMIRALTY

**PLAINTIFF’S MOTION TO FILE UNDER SEAL AN EXHIBIT CONTAINING
INFORMATION SUBJECT TO A PROTECTIVE AGREEMENT**

Plaintiff PSARA ENERGY, LTD. hereby moves the Court for an order permitting it to file under seal an exhibit in support of their forthcoming Response in Opposition to Advantage Defendants’ Motion to Vacate Attachment or, alternatively, For Reduction in Security (Doc. 7). The exhibit in question is Exhibit K¹ to the Declaration of Despoina Bacha (‘BACHA DECLARATION’). The exhibit includes confidential information received from The Bank of New York Mellon (the “Bank”), in which the Bank disclosed to Plaintiff under subpoena in Civil Action No. 16-cv-04840, confidential electronic fund transfers data pursuant to a protective agreement signed between Plaintiff and the Bank dated December 7, 2016.

¹ Exhibit K was originally produced to Plaintiff in .xlsx (Microsoft Excel) format. Due to the number of columns contained in the Excel spreadsheet, Plaintiff is not able to file a legible copy in .pdf format. Therefore, Plaintiff will file only the relevant columns contained within the Excel spreadsheet in .pdf format with the Court, but will also make available to the Court and Defendants the entire spreadsheet in its native (.xlsx) electronic format.

Because the exhibit in question is subject to a protective agreement, Plaintiff respectfully requests that it be allowed to file Exhibit K to the Declaration of Despoina Bacha under seal to prevent the exhibit from being made part of the public record. Plaintiff has conferred with opposing counsel and this Motion is unopposed. Plaintiff will serve the sealed exhibit on opposing counsel in electronic form in accordance with Local Rule CV-5(a)(7)(D).

Dated: April 27, 2018
Houston, Texas

Respectfully submitted,

GAITAS, KENNEDY & CHALOS, P.C.

By: /s/George A. Gaitas
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Psara Energy, Ltd.

CERTIFICATE OF CONFERENCE

Counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and the motion is unopposed. The personal conference required by the rules was conducted on April 27, 2018 via telephone. The participants were Jonathan M. Chalos and Marc G. Matthews.

/s/George A. Gaitas
George A. Gaitas

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2018, I electronically filed the foregoing Motion with the Clerk of the Court using the cm/ECF system, which will send notification of such filing to all attorneys of record at their email addresses on file with the Court.

/s/George A. Gaitas
George A. Gaitas